

exposing the photosensitive layer to light through a mask, said mask [having] comprising a pattern [corresponding to cells of the plasma display device, a] of horizontal lines [pattern for defining a barrier,] and [a] vertical lines [pattern for defining a barrier between two adjacent cells], wherein the horizontal lines define a plurality of parallel linear barriers, and wherein the vertical lines define a plurality of raised portions extending substantially perpendicularly between adjacent barriers; and etching the barrier material layer to form said plurality of cells.

REMARKS

In the last Office Action, the Examiner rejected claims 1-3 and 5-13 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,682,081 to Reynolds ("Reynolds"); rejected claims 1-13 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,723,945 to Schermerhorn ("Schermerhorn"); and rejected claims 4 and 14 under 35 U.S.C. § 103(a) as being unpatentable over Reynolds in view of "common knowledge in the art."

By this amendment, Applicant proposes amending claims 1-14 in order to more clearly recite Applicant's invention.

Regarding the finality of the Office Action of April 5, 2000, Applicant respectfully traverses the propriety of that finality. The Examiner asserted at page 5 of the Office Action that Applicant's amendments to the claims necessitated the new ground for rejection. As pointed out in our last response, however, the Examiner incorrectly rejected claims 1-13 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No.

LAW OFFICES

FINNEGAN, HENDERSON,
FARABOW, GARRETT,
& DUNNER, L.L.P.
1300 I STREET, N. W.
WASHINGTON, DC 20005
202-408-4000

B

5,770,921 to Aoki. Whether Applicant amended the claims or not is irrelevant if the previous rejection was facially invalid. Because as a matter of law the previous rejection was untenable, the Examiner's assertion that Applicant's amendment necessitated the new ground of rejection is in error. Applicant, therefore, requests that the finality of the last Office Action be withdrawn.

Regarding the rejection of claim 1 as being anticipated by Reynolds or Schermerhorn, Applicants respectfully traverse this rejection. Claim 1 is directed to a combination of elements including a plurality of linear parallel barriers formed on a first substrate and a plurality of raised portions extending substantially perpendicularly between adjacent barriers. Applicant's Fig. 7 and the accompanying description at page 7, lines 1-7, for example, describes a mask for forming the barrier layer structure of Applicant's invention. The mask includes a horizontal pattern 110 for exposing the barriers. The mask also includes a vertical pattern 111, which forms the raised portions A of Fig. 5.

As shown in Fig. 2 of Reynolds, Reynolds teaches a plurality of lands 40. Without accepting that lands 40 of Reynolds are properly interpreted as barriers as claimed, the reference fails to teach a plurality of raised portions extending substantially perpendicularly between adjacent lands 40. Reynolds, therefore, fails to anticipate Applicant's claimed invention.

Further, as shown in Figs. 7-13 of Schermerhorn, that reference similarly shows barrier ribs 24, but fails to teach a plurality of raised portion extending substantially

LAW OFFICES

FINNEGAN, HENDERSON,
FARABOW, GARRETT,
& DUNNER, L.L.P.
1300 I STREET, N. W.
WASHINGTON, DC 20005
202-408-4000

perpendicularly between adjacent barrier ribs 24. For essentially the same reasons, therefore, Schermerhorn also fails to anticipate Applicant's claimed invention.

Regarding claims 2, 3, and 5-11, these claims are patentable over Reynolds, at least, in view of their dependence from claim 1.

Regarding claims 2-11, these claims are patentable over Schermerhorn, at least, in view of their dependence from claim 1.

Regarding claim 12, this claim is patentable over Reynolds for at least essentially the same reasons expressed above with respect to claim 1.

Regarding claims 12 and 14, these claims are patentable over Schermerhorn for at least essentially the same reasons expressed above with respect to claim 1.

Regarding claim 13, this claim is patentable over Reynolds and Schermerhorn at least, in view of its dependence from claims 12.

Regarding the rejection of claims 4 and 14 as being unpatentable over Reynolds in view of "common knowledge in the art," Applicant respectfully asserts that the "common knowledge in the art" fails to cure the defects in Reynolds. Applicant asserts that none of the prior art cited by the Examiner teaches or suggests a structure having barriers and raised portions extending between those barriers as recited. Applicant, therefore, requests the allowance of claims 4 and 14.

Applicant respectfully requests that this Amendment under 37 C.F.R. § 1.116 be entered by the Examiner, placing claims 1-14 in condition for allowance. Applicant submits that the proposed amendments of claims 1-14 should be entered because the

LAW OFFICES

FINNEGAN, HENDERSON,
FARABOW, GARRETT,
& DUNNER, L.L.P.
1300 I STREET, N. W.
WASHINGTON, DC 20005
202-408-4000

B

finality of the last Office Action was in error. Therefore, this Amendment should allow for immediate action by the Examiner.

Furthermore, Applicant respectfully points out that the final action by the Examiner presented some new arguments as to the application of the art against Applicant's invention. It is respectfully submitted that the entering of the Amendment would allow the Applicant to reply to the final rejections and place the application in condition for allowance.

Finally, Applicant submits that the entry of the amendment would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

In view of the foregoing remarks, Applicant submits that the claimed invention, as amended, is neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicant therefore requests the entry of this Amendment, the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

By: Walter J. Butcher Reg. No. 24,914
for Andrew Chanho Sonu
Reg. No. 33,457

Dated: June 8, 2000